



DEPARTMENT OF THE ARMY  
HEADQUARTERS 54<sup>TH</sup> BRIGADE ENGINEERING BATTALION  
173 INFANTRY BRIGADE COMBAT TEAM (AIRBORNE)  
APO, AE 09605

AESE - BG

28 September 2021

MEMORANDUM FOR: Commander, 54th BEB, Brigade Engineer Battalion (Airborne)

SUBJECT: Temporary Administrative Exemption from Immunization for SSG Brown, Steven M.  
(DODID: 1464975043)

1. References

- a. AR 40-562, Immunizations and Chemoprophylaxis, 29 SEP, 2006.
- b. AR 600-20, Army Command Policy, 24 JUL 2020.
2. On 27 September 2021, I conducted an in person discussion with SSG Steven Brown regarding a temporary administrative exemption from immunization against the SARS-CoV-2 Virus (COVID-19) as he would be willing to receive Pfizer's vaccine Comirnaty but not the on hand Pfizer-BioNTech COVID-19 Vaccine as he believes this would be an unlawful order
3. Medical Counseling: SSG Brown was rational during our in clinic discussion. He was extensively counseled to make an informed decision. We discussed the following:
  - a. COVID-19 Vaccination is **NOT** gene therapy
  - b. Meta-analysis demonstrate that the morbidity and mortality will greatly outweigh any risk associated with *unexpected* side effects 10 years from now from any EUA/FDA vaccine available
  - c. The current vaccines one hand does not have the label Comirnaty on the vile however this vaccine is identical to the current Pfizer-BioNTech COVID-19 Vaccine that has been administered in our footprint. These have the **SAME** formulation
4. According to the attached memo by the assistant secretary of defense, "DoD health care providers will use both the Pfizer- BioNtech COVID-19 vaccine and the Comirnaty COVID-19 vaccine interchangeably for the purpose of vaccinating service members in accordance with the Secretary of Defense Memorandum,..."
5. Recommendation: There is no evidenced based medicine that would preclude SSG Brown from being vaccinated against COVID-19 IAW current guidelines.
6. The point of contact for this memorandum is the undersigned at 314-590-9845 or [Richard.d.palomino.mil@mail.mil](mailto:Richard.d.palomino.mil@mail.mil)

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